

RECEIVED

TOE RANGER PICKETT, #28361
Full name and prison number
of plaintiff(s)

v.

Bob Riley, Donald Campbell, Lee Posey Daniels,

Donald Adair, Franklin Brown, Michelle Ellington,

Roderick Brown, Demetrious Holstick, Clarence,

Kimbrough, William Howard and Terrance

McDonnell

Name of person(s) who violated
your constitutional rights.
(List the names of all the
persons.)

2005 SEP 28 A 9:14
CIVIL ACTION NO. 2:05cv924-T
(To be supplied by Clerk of
U.S. District Court)

I. PREVIOUS LAWSUITS

A. Have you begun other lawsuits in state or federal court
dealing with the same or similar facts involved in this
action? YES () NO ()

B. Have you begun other lawsuits in state or federal court
relating to your imprisonment? YES () NO ()

C. If your answer to A or B is yes, describe each lawsuit
in the space below. (If there is more than one lawsuit,
describe the additional lawsuits on another piece of
paper, using the same outline.)

1. Parties to this previous lawsuit:

Plaintiff(s) Carl Moore, et al.

Defendant(s) Bob Riley, et al.

2. Court (if federal court, name the district; if
state court, name the county) MIDDLE DISTRICT
OF ALABAMA

3. Docket number 2:05-cv-669-F4. Name of judge to whom case was assigned U.S.Magistrate Charles S. Coody5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?) PlaintiffWas Stricken as Plaintiff by U.S. Magistrate Coody6. Approximate date of filing lawsuit On or about July 20057. Approximate date of disposition 7-26-05II. PLACE OF PRESENT CONFINEMENT Kilby Correctional Facility, P.O.Box 150, Mt. Meigs, Alabama 36057-0150PLACE OF INSTITUTION WHERE INCIDENT OCCURRED Montgomery Community Work Center in conjunction with Kilby Correctional Facility all AL BX.

III. NAME AND ADDRESS OF INDIVIDUAL(S) YOU ALLEGE VIOLATED YOUR CONSTITUTIONAL RIGHTS.

	NAME	ADDRESS
1.	Bob Riley	State Capital, 600 Dexter Avenue, Room N-103, Montgomery, AL 36130
2.	DONALD CAMPBELL	64 N. Union Street, Montgomery, AL 36130
3.	Lee Posey Daniels, P.O. Box 75, Mt. Meigs, AL 36057	
4.	Franklin Brown P.O. Box 75, Mt. Meigs, AL 36057	
5.	Terrance McDonnell, P.O. Box 150, Mt. Meigs, AL 36057-0150	
6.	Michelle Ellington, P.O. Box 75, Mt. Meigs, AL 36057	
7.	Roderick Brewton, P.O. Box 75, Mt. Meigs, AL 36057	
8.	Demetrious Holstick, P.O. Box 75, Mt. Meigs, AL 36057	
9.	Donald Adair, P.O. Box 75, Mt. Meigs, AL 36057	
10.	Clarence Kimbrough, P.O. Box 75, Mt. Meigs, AL 36057	
11.	William Howard, P.O. Box 75, Mt. Meigs, AL 36057	

IV. THE DATE UPON WHICH SAID VIOLATION OCCURRED January 30, 2004and Continuously

V. STATE BRIEFLY THE GROUNDS ON WHICH YOU BASE YOUR ALLEGATION THAT YOUR CONSTITUTIONAL RIGHTS ARE BEING VIOLATED:

GROUND ONE: Defendants Riley, Campbell, Daniels, McDonnell in conspiracy with other defendants herein violated Plaintiff Eighth and Fourteenth Amendment of the U.S. Constitution to be free from overcrowded health hazard imminent danger conditions.

Defendants Riley Governor, Campbell Commissioner, Daniels Warden, McDonnell Warden
acted in concert to violate and interfere with Plaintiff's Eighth and Fourteenth Amend-
ment Rights of the United States Constitution by forcing Plaintiff to live in overcrowded
dilapidated Montgomery Community Work Center and Kilby Correctional facilities with broken
down plumbing with Colored poison drinking water mixed with human feces leaking through the
old unseal concrete floors and stopped up fire doors for 40 inmates, and lack of security with unwarranted beatings,
GROUND TWO: Defendants Brown, Adair, Ellington, Brewton, Holstick, Kimbrough and^(of inmates)

William Howard acting under color of State law Conspired to violate Plaintiff Fourteenth Amendment fail to
to follow Standard Operation Procedure as required by Admin. Reg. #403, § 14-3-13 Code of Alabama 1975.
SUPPORTING FACTS: Defendants Brown, Howard, Kimbrough and Adair acted in

Concert to violate Plaintiff on April 29, 2005, May 28, 2005 used an altered
Criminal forged disciplinary document for an allege Rule 90 violation to
punitive and Maliciously prosecute Plaintiff in violation of their own
Standard operation procedure Admin. Reg. #403 for ALDOC governing 10 days service
of process and only re-initiation to shield defendant Howard Criminal Forgery of 101
K. Woods name who was the arresting officer in the process. Defendant Brown illegally admin. oaths.
GROUND THREE: Defendants Brewton, Ellington, Adair and Holstick violated

Their own Standard operation procedure of Admin. Reg. #403, used tempered urine sample and illegally
administer oaths to maliciously prosecute Plaintiff for punitive transfer in violation of Plaintiff 4th and 14th.
SUPPORTING FACTS: On 6, 2005, defendant Brewton and Holstick acted in concert

taking a urine sample from Plaintiff in one cup, then defendant Holstick poured Plaintiff urine
in another cup and stuck a sure drug test strip in the without the temperature seal, and on July 27, 2005,
defendant Ellington without authorization illegally administered oaths and subsequently
found Plaintiff guilty even though Admin. Reg. #403 requirements had not been met coupled with tempered
urine. On July 27, 2005, the same defendant Adair Approved the illegal process in violation of Plaintiff
Due Process, and Plaintiff was punitively transferred to Kilby Corr. Fac. and stripped of
his minimum custody status to Medium. No State shall deprive any person their liberty
interest without Due Process of law. U.S. Const. Amend. § 14, 1, 6 LEd. 2d 1230 (1960).

VI. STATE BRIEFLY EXACTLY WHAT YOU WANT THE COURT TO DO FOR YOU.
MAKE NO LEGAL ARGUMENT. CITE NO CASES OR STATUTES.

Plaintiff seek a preliminary injunction restraining older to defendant stop immediately housing Plaintiff at dilapidated imminent danger over 20 years old Kilby, Stop retalcion, Expunge punitive disciplines used to punitively transfer Plaintiff to a medium custody to c. without due process. Jury trial, Fed. Crim. Prosecution for interfering with Plaintiff's Civil Rights. for Punitive treatment, Plaintiff seek \$150,000.00 in damages for loss of rights. 8th and 14th U.S. Const. Amend. And Attorney fees.

Joe Ranger Rickett, #128361
Signature of plaintiff(s)

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on 9-26-05
(Date)

Joe Ranger Rickett, #128361
Signature of plaintiff(s)